

Exhibit A

WITNESSES TO BE CALLED BY PLAINTIFFS

NAME TITLE, AFFILIATION	LOCATION	SUBJECT MATTER	APPROX TRAVEL TIME To SF	APPROX TRAVEL TIME To OHIO
Party Witnesses				
SkyRiver/Innovative				
Straus, Leslie President SkyRiver Technology Solutions	5850 Shellmound Way Emeryville, CA 94608	Effects of OCLC's policies and harm to SkyRiver	< 1 hr	8 hrs (incl. 1 stop)
Markwith, Michael Sales Executive SkyRiver Technology Solutions	1201 Trinidad Circle Placentia, CA 92870	Effects of OCLC's policies and harm to SkyRiver	1-2 hrs	8 hrs (incl. 1 stop)
McLaughlin, Marjorie Senior Customer Sales Consultant Innovative Interfaces	4754 Vista Lane San Diego, CA 92116	Effects of OCLC's policies and harm to Innovative Interfaces	1-2 hrs	7-8 hrs (incl. 1 stop)
Shimshock, Eugene VP Marketing Innovative Interfaces	5850 Shellmound Way Emeryville CA 94608	Effects of OCLC's policies and harm to Innovative Interfaces	<1 hr	8 hrs (incl. 1 stop)
Hofbauer, James Executive VP and CFO Innovative Interfaces	5850 Shellmound Way Emeryville, CA 94608	Effects of OCLC's policies and harm to Innovative Interfaces	<1 hr	8 hrs (incl. 1 stop)
Kline, Gerald M. Owner, SkyRiver Technology Solutions Chairman and Owner, Innovative Interfaces	5850 Shellmound Way Emeryville, CA 94608	Effects of OCLC's policies and harm to SkyRiver and Innovative Interfaces	<1 hr	8 hrs (incl. 1 stop)
OCLC				
Jordan, Robert L. President & CEO OCLC	6565 Kilgour Place Dublin, OH 43017	OCLC goals, objectives and executive decisions re: data policy, product strategy, pricing, bundling and tying; OCLC's Acquisition of Research Library Group and other companies identified in the Complaint	8 hrs (incl. 1 stop)	—
De Rosa, Catherine K. VP for the Americas & Global VP Mktg OCLC	6565 Kilgour Place Dublin, OH 43017	OCLC goals, objectives and executive decisions re: data policy, product strategy, pricing; sale of products outside the U.S. at prices lower than paid by U.S. libraries	8 hrs (incl. 1 stop)	—
Crocco, Bruce VP, Library Services for the Americas OCLC	6565 Kilgour Place Dublin, OH 43017	OCLC goals, objectives and executive decisions re: data policy, product strategy, pricing; bundling and tying	8 hrs (incl. 1 stop)	—
Afford, Larry Chair, OCLC Board of Trustees & Dean of University Libraries Temple University	Temple University University Libraries 1210 W. Berks St. Philadelphia, PA 19122	OCLC Board decisions re goals, objectives and decisions re: policies, data policy, product strategy; pricing, bundling and tying; Trustee compensation and decision processes within Temple U libraries	8 hrs (incl. 1 stop)	1-2 hrs
Michalko, James VP Research OCLC (formerly CEO of RLG)	777 Mariners Island Blvd., Suite 550 San Mateo, CA 94404	History re: negotiations for RLG merger; how terms have been met; current status of development promised to RLG members	<1 hr	8 hrs (incl. 1 stop)

NAME TITLE, AFFILIATION	LOCATION	SUBJECT MATTER	APPROX TRAVEL TIME To SF	APPROX TRAVEL TIME To OHIO
OCLC				
Ahern, Brian OCLC Library Service Consultant	3281 E. Guasti Road, Suite 560 Ontario, CA 91761	Interaction with CSULB; sales activity with other CA libraries; directives from OCLC re: sales strategy	1-2 hrs	8 hrs (incl. 1 stop)
Schottlaender, Brian OCLC Trustee & University Librarian, University of California San Diego	Geisel Library 9500 Gilman Drive #0175-G La Jolla, CA 92093	OCLC Trustee compensation; decision processes within UCSD Libraries	1-2 hrs	7-8 hrs (incl. 1 stop)
Wilson, Lizabeth (Betsy) OCLC Trustee & Dean of University Libraries, University of Washington	University of Washington Libraries Administration Box 352900 Seattle, WA 98195	OCLC Trustee compensation; decision processes within UW Libraries	2 hrs	8 hrs (incl. 1 stop)
Third-Party Witnesses				
Michigan State				
Haka, Clifford H. Director of Libraries Michigan State University	MSU University Libraries 100 Library East Lansing, MI 48824	Reasons for choosing to move to SkyRiver for cataloging; subsequent communications with OCLC and consequences of using SkyRiver	Agreed to attend trial in California	—
Fleck, Nancy Associate Director for Technical Svcs & Systems Michigan State University Libraries	MSU University Libraries 100 Library East Lansing, MI 48824	Reasons for choosing to move to SkyRiver for cataloging; subsequent communications with OCLC and consequences of using SkyRiver	Agreed to attend trial in California	—
Hyslop, Colleen Senior Associate Director for Human Resources Michigan State University Libraries	MSU University Libraries 100 Library East Lansing, MI 48824	Reasons for choosing to move to SkyRiver for cataloging; subsequent communications with OCLC and consequences of using SkyRiver	Agreed to attend trial in California	—
CSU				
Kochan, Roman V. University Library Dean & Director CSU Long Beach	CSULB Libraries 1250 Bellflower Blvd Long Beach, CA 90840	Reasons for choosing to move to SkyRiver for cataloging; subsequent communications with OCLC and consequences of using SkyRiver	1-2 hrs.	8 hrs (incl. 1 stop)
Representative(s) of CSU San Jose Library	150 E. San Fernando St. San José, CA 95112	Testimony re: how OCLC punitive pricing blocks move to SkyRiver	<1 hr	8 hrs (incl. 1 stop)
Representative(s) of CSU Chico Library	400 West 1st Street Chico, CA 95929	Testimony re: how OCLC punitive pricing blocks move to SkyRiver	3-4 hrs	7 hrs (incl 1 stop + 1-2 hr drive to Sacramento)

NAME TITLE, AFFILIATION	LOCATION	SUBJECT MATTER	APPROX TRAVEL TIME To SF	APPROX TRAVEL TIME To OHIO
UC				
Greenstein, Dan Vice Provost for Academic Planning, Programs & Coordination, University of California	University of California Office of the President 415 20th Street, 4th Fl Oakland, CA 94612	Process by which OCLC WorldCat was chosen and implemented as UC's next generation MELVYL catalog, and the associated costs incurred	<1 hr	8 hrs (incl. 1 stop)
Farley, Laine Executive Director California Digital Library	University of California Office of the President 415 20th Street, 4th Fl Oakland, CA 94612	Process by which OCLC WorldCat was chosen and implemented as UC's next generation MELVYL catalog, and the associated costs incurred	<1 hr	8 hrs (incl. 1 stop)
Brostrom, Nathan Executive VP, Business Operations University of California System	University of California Office of the President 415 20th Street, 4th Fl Oakland, CA 94612	Process by which OCLC WorldCat was chosen and implemented as UC's next generation MELVYL catalog, and the associated costs incurred	<1 hr	8 hrs (incl. 1 stop)
Schottlaender, Brian OCLC Trustee & University Librarian, University of California, San Diego	Geisel Library 9500 Gilman Drive #0175-G La Jolla, CA 92093	Process by which OCLC WorldCat was chosen and implemented as UC's next generation MELVYL catalog, and the associated costs incurred	1-2 hrs	7-8 hrs (incl. 1 stop)
Other				
Hamilton, Rita Library Director, Scottsdale Public Library	Scottsdale Public Library 3839 N. Drinkwater Blvd Scottsdale, AZ 85251	Reasons for choosing to move from OCLC to SkyRiver for cataloging; communications with OCLC	2 hrs	4-5 hrs
Representatives from libraries associated with OCLC WorldCat Local and Navigator pilot projects in California	California	Implementation experience; reasons, inducements, costs and time involved in participation	various	7-8 hrs (incl. 1 stop)

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Exhibit B

Betty Nase

From: Jerry Kline [jerry@iii.com]
Sent: Monday, September 20, 2010 2:31 PM
To: bnase@iii.com
Subject: Fwd: Testifying

X-Ninja-PIM: Scanned by Ninja
X-Ninja-AttachmentFiltering: (no action)
Subject: Testifying
Date: Mon, 13 Sep 2010 14:05:08 -0400
Thread-Topic: Testifying
Thread-Index: ActTbjLn3Q37q5ONQxG0isTrJrEwBw==
From: "Haka, Cliff" <hakac@mail.lib.msu.edu>
To: <Jerry@iii.com>
X-SEF-Processed: 7_2_0_00441_2010_09_13_11_05_12
X-SEF-Processed: 6_1_1_105_2010_09_13_11_02_24
X-MIME-Autoconverted: from quoted-printable to 8bit by iii.com id LAA28235

Hi, Jerry:

I would have no problem with testifying in California.

Cliff Haka

Betty Nase

From: Jerry Kline [jerry@iii.com]
Sent: Monday, September 20, 2010 2:32 PM
To: bnase@iii.com
Subject: Fwd: Willing to testify

X-Ninja-PIM: Scanned by Ninja
X-Ninja-AttachmentFiltering: (no action)
Subject: Willing to testify
Date: Fri, 10 Sep 2010 17:00:59 -0400
Thread-Topic: Willing to testify
Thread-Index: ActRKwghs4rpgKnnQ4qiaEkbuDoN9Q==
From: "Fleck, Nancy" <fleckn@mail.lib.msu.edu>
To: <jerry@iii.com>
X-SEF-Processed: 7_2_0_00441_2010_09_10_14_01_09
X-SEF-Processed: 6_1_1_105_2010_09_10_13_58_29

Due to your recent inquiry, I am writing to state that I am more than willing to testify in San Francisco, CA. should the need arise.

Nancy W. Fleck
Associate Director for Technical Services and Systems
Michigan State University Libraries

Betty Nase

From: Jerry Kline [jerry@iii.com]
Sent: Monday, September 20, 2010 2:32 PM
To: bnase@iii.com
Subject: Fwd: Testifying in California

X-Ninja-PIM: Scanned by Ninja
X-Ninja-AttachmentFiltering: (no action)
Subject: Testifying in California
Date: Fri, 10 Sep 2010 15:01:47 -0400
Thread-Topic: Testifying in California
Thread-Index: ActRGp5q5lQtGPu2QXGe/AUneS1WEQ==
From: "Hyslop, Colleen" <hyslop@mail.lib.msu.edu>
To: <jerry@iii.com>
X-SEF-Processed: 7_2_0_00441_2010_09_10_12_01_58
X-SEF-Processed: 6_1_1_105_2010_09_10_11_59_17

Hi, Jerry,

In response to your question, I am writing to confirm that I am very willing to testify in San Francisco.

Colleen

Colleen F. Hyslop
Senior Associate Director and Head of Human Resources
Michigan State University Libraries
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East Lansing, MI 48824-1048
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